

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO.</b> _____
<b>v.</b>	<b>:</b>	<b>DATE FILED:</b> _____
<b>TODD KING</b>	<b>:</b>	<b>VIOLATIONS: 18 U.S.C. § 1951</b>
	<b>:</b>	<b>(conspiracy to</b>
	<b>:</b>	<b>interfere with</b>
	<b>:</b>	<b>interstate commerce</b>
	<b>:</b>	<b>by robbery - 1 Count)</b>

**INFORMATION**

**COUNT ONE**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

1. At all times material to this Indictment, the K-Mart located at 7500 Crescent Boulevard, Pennsauken, New Jersey, engaged in activities which affected interstate commerce, selling all types of merchandise to its customers.
2. From in or about April 2000, to on or about May 30, 2000, at Philadelphia, in the Eastern District of Pennsylvania, and elsewhere defendant

**TODD KING**

conspired and agreed with Nathaniel Williams, Nathaniel Mapp, a/k/a "Tommy Mapp," Clifford Anthony Reeves, William Allen, and Rhonda Kersey, each charged elsewhere, and other persons unknown to the grand jury, to commit robbery, and thereby obstruct, delay, and affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), in that, the defendant agreed to unlawfully take and obtain property, that is, approximately \$120,000 in United States currency, belonging to and in the custody of the employees of the K-Mart located at 7500

Crescent Boulevard, Pennsauken, New Jersey, against their will, by means of actual and threatened force, violence and fear of injury, immediate and future, to their persons and property in their custody, all in violation of Title 18, United States Code, Section 1951.

### **MANNER AND MEANS**

3. It was part of the conspiracy to rob the K-Mart at 7500 Crescent Boulevard, Pennsauken, New Jersey, by use of force, threats of force and violence and the use of dangerous weapons, that is, handguns.

4. It was further part of the conspiracy to confront the night shift employees at approximately 2 a.m. on May 30, 2000 in the employee break room of the K-Mart store, identify the night shift manager and direct the manager to show the conspirators the cash room and the security room of the store.

5. It was further part of the conspiracy to await the arrival of the day shift manager, Nathaniel Williams, at 5:45 a.m., confront Williams, and escort Williams and the night shift manager to the cash office of the store, force the night manager to lay on the ground outside the vault room while one of the accomplices escorted Nathaniel Williams into the vault room. Williams was directed to open the large safe and the small safe which was located within the larger safe in order to steal United States currency.

6. It was further part of the conspiracy to steal approximately \$120,000 in United States currency from the safes in the K-Mart store, as well as the video surveillance tapes from the security room of the store, and flee the store premises.

7. It was further part of the conspiracy that, according to a pre-arranged plan made between Nathaniel Williams and defendant **TODD KING**, upon completion of the robbery, defendant **TODD KING** would proceed to the Wilmot Street, Philadelphia,

Pennsylvania residence of Nathaniel Williams and Rhonda Kersey, where the robbers planned to meet following the robbery, take custody of a bag containing the majority of the proceeds of the robbery that were intended for Nathaniel Williams, and remove the bag from Williams' residence for safekeeping.

### **OVERT ACTS**

In furtherance of the conspiracy and to accomplish its objective, the following overt acts, among others, were committed in the Eastern District of Pennsylvania:

1. On or about May 29, 2000, at approximately 10:00 p.m., Nathaniel Mapp, a/k/a "Tommy Mapp," and William Allen, two accomplices of Nathaniel Williams, entered the K-Mart at 7500 Crescent Boulevard, Pennsauken, New Jersey, as it was closing for the purpose of concealing themselves in the store after it closed in order to carry out a robbery of the store during the early morning hours of May 30, 2000.

2. On or about May 30, 2000, at approximately 2:00 a.m., Nathaniel Mapp, a/k/a "Tommy Mapp," and William Allen confronted employees of the K-Mart at 7500 Crescent Boulevard, Pennsauken, New Jersey, in the employee break room, brandished handguns and forced the night manager to accompany them to the cash room and store security room where the security surveillance tapes were located. These two accomplices then waited for the arrival of Nathaniel Williams, the oncoming day shift manager.

3. On or about May 30, 2000, at approximately 5:00 a.m., Nathaniel Williams departed his residence in Philadelphia, Pennsylvania enroute to the K-Mart at 7500 Crescent Boulevard, Pennsauken, New Jersey. Upon arrival at the parking lot of this K-Mart, at approximately 5:30 a.m., Nathaniel Williams rendezvoused with a vehicle driven by Clifford

Anthony Reeves, a third accomplice. The vehicle was described by a witness as a two tone black and silver sedan with tinted windows and custom rims.

4. On or about May 30, 2000, at approximately 5:44 a.m., Nathaniel Williams entered the K-Mart at 7500 Crescent Boulevard, Pennsauken, New Jersey. He walked to the back of the store in the direction of the employee break room when he was confronted by his two accomplices, Nathaniel Mapp, a/k/a “Tommy Mapp,” and William Allen.

5. On or about May 30, 2000, Nathaniel Williams and the night shift manager was escorted by Nathaniel Mapp, a/k/a “Tommy Mapp,” and William Allen, two accomplices of Williams, to the back cash room. The night shift manager was ordered to lay on the cash room floor, outside of the vault room, while the shorter of the two accomplices escorted Williams into the vault room. While in the vault room, Williams opened the large safe as well as the smaller inner safe. The shorter of the two accomplices of Williams put approximately \$120,000 in United States currency in a bag.

6. On or about May 30, 2000, Nathaniel Mapp, a/k/a “Tommy Mapp,” and William Allen then escorted the entire employee staff, including their accomplice, Nathaniel Williams, into the walk-in vault of the K-Mart at 7500 Crescent Boulevard, Pennsauken, New Jersey, and made their escape.

7. On or about May 30, 2000, between approximately 2:00 a.m. and approximately 6:30 a.m., during the armed robbery of the K-Mart at 7500 Crescent Boulevard, Pennsauken, New Jersey, Nathaniel Mapp, a/k/a “Tommy Mapp,” and William Allen, the two accomplices of Nathaniel Williams, gained access to the store’s security surveillance room and stole the security surveillance tapes.

8. On or about May 30, 2000, between the times of 5:06:48 a.m. and 5:38:36 a.m., a SPRINT cellular telephone, number (215) 868-5148, subscribed to by Debra L. Williams, mother of Nathaniel Williams, and operated by Nathaniel Williams, made eleven (11) outgoing phone calls and three incoming phone calls to and/or from telephone numbers and/or pagers associated with Rhonda Kersey (girlfriend of Nathaniel Williams), Clifford Anthony Reeves, Nathaniel Mapp, a/k/a “Tommy Mapp,” and William Allen, a/k/a “Bill.”

9. On or about May 30, 2000, during the morning hours, defendant **TODD KING**, according to a previously arranged plan made with Nathaniel Williams, proceeded to the Wilmot Street, Philadelphia, Pennsylvania residence of Nathaniel Williams and Rhonda Kersey and, in the presence of Kersey, Nathaniel Mapp, a/k/a “Tommy Mapp,” William Allen and Clifford Anthony Reeves, took custody from Rhonda Kersey of a bag containing approximately \$70,000, representing the proceeds of the robbery of the Pennsauken K-Mart on May 30, 2000, and departed from the residence with the bag of robbery proceeds.

In violation of Title 18, United States Code, Section 1951(a).

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**PATRICK L. MEEHAN**  
**United States Attorney**